

1 DAVID J. KAMINSKI (SBN 128509)
kaminskid@cmtlaw.com
2 ROBERT D. BERGLUND (SBN 234081)
berglunr@cmtlaw.com
3 CARLSON & MESSER LLP
5959 W. Century Boulevard, Suite 1214
4 Los Angeles, California 90045
(310) 242-2200 Telephone
5 (310) 242-2222 Facsimile

6 Attorneys for Defendant,
FIRSTSOURCE ADVANTAGE, LLC

7
8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10
11 ALFRED LARRAGA,
12 Plaintiff,

13 vs.

14 FIRSTSOURCE ADVANTAGE,
15 Defendant.
16
17
18

CASE NO. 09-cv-02741-L (NLS)

**JOINT MOTION OF PLAINTIFF
ALFRED LARRAGA AND
DEFENDANT FIRSTSOURCE
ADVANTAGE, LLC TO DISMISS
THE ENTIRE ACTION, WITH
PREJUDICE**

19
20 TO THE HONORABLE COURT, TO ALL PARTIES HEREIN AND TO THEIR
21 RESPECTIVE COUNSEL OF RECORD:

22 **PLEASE TAKE NOTICE** that Plaintiff ALFRED LARRAGA and Defendant
23 FIRSTSOURCE ADVANTAGE, LLC hereby file this Joint Motion to Dismiss the
24 above-entitled action, in its entirety, with prejudice pursuant to FRCP 41(a)(1).

25 ///

26 ///

27 ///

28 ///

1 Each party to bear their own costs and expenses.

2
3 DATED: May 25, 2010

KROHN & MOSS, LTD

4
5 By: 

Ryan Lee
Attorneys for Plaintiff,
ALFRED LARRAGA

6
7
8 DATED: May 25, 2010

CARLSON & MESSER LLP

9
10 By: s/ Robert D. Berglund

David J. Kaminski
Robert D. Berglund
Attorneys for Defendant,
FIRSTSOURCE ADVANTAGE,
LLC

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
 COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California.

I am over the age of eighteen years and not a party to the within action. My business address is 5959 W. Century Blvd., Suite 1214, Los Angeles, CA 90045.

On May 26, 2010, I served the foregoing document(s) described as: **JOINT MOTION OF PLAINTIFF ALFRED LARRAGA AND DEFENDANT FIRSTSOURCE ADVANTAGE, LLC TO DISMISS THE ENTIRE ACTION, WITH PREJUDICE** on all interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST☐ **BY ELECTRONIC MAIL :**

Based on Court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the said documents to be sent to the persons at the electronic mail addresses listed below (see attached service list). I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **BY MAIL:** I sealed such envelope(s) and placed it (them) for collection and mailing on this date following the ordinary business practices of Carlson & Messer LLP. I am "readily familiar" with the business practices of Carlson & Messer LLP for collection and processing of correspondence for mailing with the United States Postal Service. Such correspondence would be deposited with the United States Postal Service at Los Angeles, California this same day in the ordinary course of business with postage thereon fully prepaid.

☐ **VIA NEXT DAY FEDERAL EXPRESS**

I delivered the above described documents in the above described envelopes to Federal Express for delivery via FedEx next business morning.

☐ (STATE) - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (FEDERAL) - I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.

Executed this **26th** day of **May 2010** at Los Angeles, California.


 Linda Brooks

SERVICE LIST
Alfred Larraga v. Firstsource Advantage
Our File No . 06164.00

Ryan Lee, Esq.
Krohn & Moss, Ltd
10474 Santa Monica, Blvd., Ste. 401
Los Angeles, CA 90025
Tel: (323) 988-2400 x235
Fax (866) 802-0021
Cell Phone for Ryan Lee: (480) 227-7612
E-mail address:
rlee@consumerlawcenter.com

Attorneys for Plaintiff,
ALFRED LARRAGA